

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Crim. No. 18-150(1) (DWF/HB)

UNITED STATES OF AMERICA,)
)
Plaintiff,) **Defendant's Consolidated Motions in**
) **Limine**
vs.)
)
MICHAEL HARI,)
)
Defendant.)

Michael Hari, by and through his attorneys, Shannon Elkins and James Becker, hereby requests that the Court issue an order as follows:

1. Providing each of the parties 40 minutes of voir dire to question the jury regarding background, experiences and potential biases.
2. Ordering that all firearms be excluded from the courtroom as their appearance, functioning and manufacturing are irrelevant and not probative to the Actus Reus in the case at hand. FRE 401. And their presence in the courtroom is unnecessarily prejudicial to Mr. Hari. FRE 403
3. Permit Defense Investigators to remain in the Courtroom during testimony in order to assist with the defense of Mr. Hari. Similar to the government's case agent, the investigators are needed by defense counsel to follow up on information that is derived from testimony and to respond as needed to the dynamic situations in trial. The investigators may be called by Mr. Hari as a witness in the trial.
4. Ordering the government to admonish the witnesses as to evidence and testimony ruled inadmissible by the Court during pretrial litigation.
5. Ordering witnesses be sequestered and told not discuss their testimony with each other.

Dated: September 29, 2020

Respectfully submitted,

s/Shannon Elkins

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s/James S. Becker

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